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JENNIFER NIN and DIANNE TRITSCHLER,

-against-

**AFFIDAVIT IN SUPPORT**  
**OF ORDER TO**  
**SHOW CAUSE**

**FILED**  
IN CLERK'S OFFICE  
U.S. DISTRICT COURT E.D.N.Y.

★ MAR 22 2019 ★

LONG ISLAND OFFICE

**CV - 19 1546**

FEUERSTEIN, J.

TOMLINSON, M.J.

Defendants.

STATE OF NEW YORK)  
                                ) ss.:  
COUNTY OF SUFFOLK)

Plaintiff, GLEN KLEIN, being duly sworn deposes and states  
under penalties of perjury as follows:

(1) I am a Detective from the New York City Police Department who retired on January 3, 2003.

(2) I was assigned to the New York City Police Department's Emergency Service Unit for over 16 years.

(3) I personally responded to and worked at 911 for over 800 hours. After retiring I became an advocate for first responders and police officers who suffered from Post Traumatic Stress Disorder as many officers refused to seek help from the horrors they encountered at 911.

(4) Upon retiring as a highly decorated police officer having been decorated over 25 times and having received the Combat Cross of the NYPD, the second highest honor, I was issued a pistol license from the County of Suffolk, State of New York, as a retired police officer.

(5) I started a company along with my partner, Anthony Passalacqua, called Front Line Training Center, LLC. in October of 2014. We train law enforcement and retired law enforcement to qualify under House Resolution §218, Senate Bill §1132, which allows qualified law enforcement to carry their weapons throughout the County.

(6) In October of 2016 our company was issued a Federal Firearms License. We then applied for a New York Gun Dealer License in October of 2017 through the Suffolk County Police Department Pistol License Bureau.

(7) In March of 2018 an inquiry of the status of the license for Front Line Training Center was made. In April of 2018 Anthony Passalacqua was contacted by Investigator Carpenter of the Suffolk County Pistol License Section seeking additional information regarding the application.

(8) In May we were notified that my pistol license was suspended and therefore the gun dealer license was denied. Further inquiry demonstrated that my license had been allegedly suspended based upon an article in the Suffolk Patrolman's Benevolent Association's "On Patrol" magazine which documented my advocacy and work with Post Traumatic Stress Disorder's suffered by police officers who responded to 911. A copy of such article can not be found.

(9) I was directed to obtain a letter from my Psychologist, Frank Dowling M.D., stating that I was not a danger. Upon receiving said letter from Dr. Dowling I submitted same to the Suffolk County Pistol License Section in July, 2018 and my license was reinstated by letter dated October 15, 2018. I was then advised by the Suffolk County Property Section that it could take up to 6 months to return my guns and that they had the right to conduct their own Property Section Investigation. A call to several high level Suffolk County Police Officials resulted in an expedited return of my guns. When I picked up my property a comment was made that I must know somebody.

(10) By letter dated December 19, 2018 I was advised that my pistol license was again suspended and that I had to surrender my guns due to an investigation into the matter complained of herein.

(11) On December 27, 2018 I surrendered my guns to the Suffolk County Police Department once again.

(12) As a retired NYPD Detective I was notified in March of 2019 that MS13 is seeking to kill NYPD police officers on Long Island in retaliation for the intense law enforcement actions they are under. Our unions and associations are advising that they are not discriminating between active and retired NYPD personnel and we are to be very cautious. Moreover, the Brentwood and Central Islip areas are of the greatest concern.

(13) I continue to run Front Line Training Center LLC. located in the Town of Islip not far from the targeted areas and we are well known to train active and retired law enforcement.

(14) Further, being a part of the Emergency Service Unit, we are the unit that is always called in for all search warrants and for prominent arrests of persons known to have no fear of police personnel. I have participated in thousands of such "Take Downs" of such persons and I served on the Emergency Service Unit's Elite Tactical Apprehension Team which trains even more strenuously for these types of encounters.

(15) I have carried a weapon for 36 years and have never had any gun incident while not at work in the NYPD. Moreover, I was never the subject of any discipline during my entire time with the NYPD. Taking my ability to protect my family and myself has put us in peril.

Dated: March 5, 2019  
Central Islip, New York

Glen Klein  
Glen Klein

Sworn to before me this *15th*  
day of March, 2019

Melinda Osik  
Notary Public

